



Lawyers since 1897

Ryan, Swanson & Cleveland, PLLC
1201 Third Avenue, Suite 3400
Seattle, WA 98101-3034
206.464.4224 | Fax 206.583.0359
Toll-free 800.458.5973
www.ryanswansonlaw.com

Jo M. Flannery
Attorney Of Counsel

direct dial 206.654.2241
flannery@ryanlaw.com
Ref. No. 1111486.01/015435.00010

May 8, 2015

Michelle Mullin, Project Manager
U.S. Environmental Protection Agency - Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101

Re: Rainier Commons, LLC – Old Rainier Brewery Exterior Paint Abatement
Phase II Individual Phased Work Plan (IPWP) – Supplement No. 2

Dear Ms. Mullin:

Please accept this submittal as Rainier Commons' Supplement No. 2 to the IPWP for Phase II. Enclosed herewith are exhibits detailing the information adding the South Wall of Building 15 to the Phase II scope of work. Sampling in five locations indicates a TSCA exceedance on one area of the wall only (see sketch included as Exhibit 1). The first three informational samples collected included both paint and substrate (see laboratory results included as Exhibit 2). The second two informational samples included just the layers of paint (see laboratory results included as Exhibit 3). While this wall was a lower priority area of the campus, as Rainier Commons previously indicated the remediation for this wall is required now to accommodate planned construction adjacent to the wall. Adding this section of Building 15 to the pending scope of work does not change the Phase II IPWP in any other manner or detail. Photographs and diagrams of the wall are enclosed as Exhibit 4. A narrative description regarding the roof drain configuration and protection is included as Exhibit 5.

If you have questions at this time please contact our office or Rainier Commons' Project Manager.

Very truly yours,

RYAN, SWANSON & CLEVELAND, PLLC

Jo M. Flannery
Attorney Of Counsel

Charter Member of TAGLaw,
a worldwide network of law firms

RCLLC 0009533

May 8, 2015
Page 2

Enclosures

cc: Client

Alex Fidis, EPA Regional Counsel (via electronic copy with enclosures)

Mark Marcell, CGI (via electronic copy with enclosures)

Dave Leonard, NVL (via electronic copy with enclosures)

EXHIBIT 1

COMBINED PAINT WITH
⊕ = SUBSTRATE SAMPLES

⊕ = BULK PAINT CHIP SAMPLES

VALUES LISTED IN mg/kg (PPM)

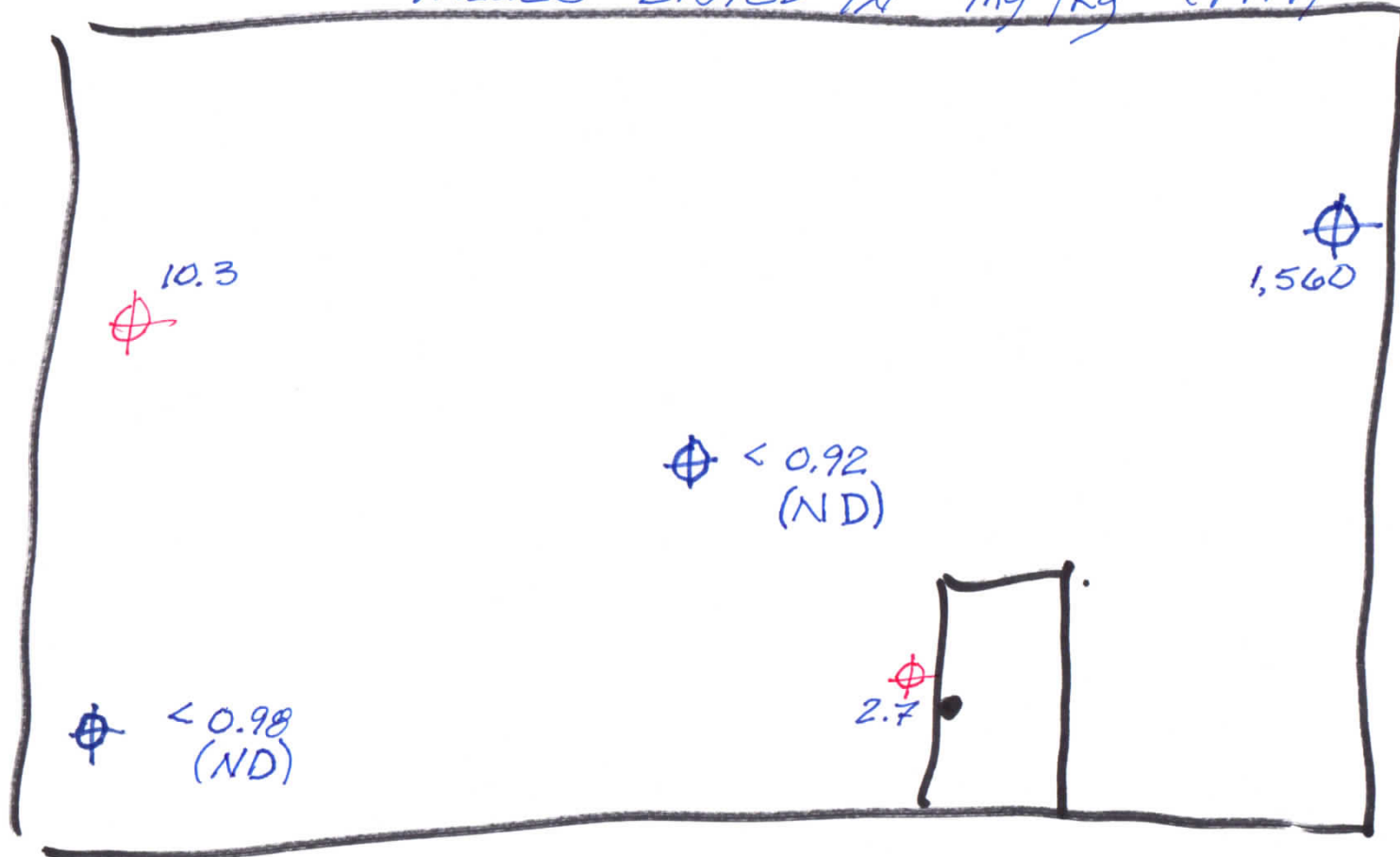


EXHIBIT 2



Laboratory | Management | Training

April 2, 2015

Mr. Marcus Gladden
NVL Field Services Division
4708 Aurora Ave. N.
Seattle, 98103

Re: **NVL Batch 1505676.00**

Project Name/Number: 2012-494

Project location: 3100 Airport Way S. Seattle, WA 98134

Dear Mr. Gladden,

Enclosed please find test results for samples submitted to our laboratory for analysis. Preparation and analysis of these samples were conducted in accordance with published industry standards and methods specified on the attached analytical report.

The content of this package consists of the following:

- Case Narrative & Definition of Data Qualifiers
- Analytical Test Results
- Applicable QC Summary
- Client Chain-of-Custody (CoC)
- NVL Receiving Record

The report is considered highly confidential and will not be released without your approval. Samples are archived for two weeks following analysis. Samples that are not retrieved by the client will be discarded after two weeks.

Thank you for using our laboratory services. If you need further assistance, please contact us at 206-547-0100 or 1-888-NVLLABS.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Ly".

Nick Ly, Technical Director

Enclosure: Sample Results

Phone: 206.547.0100 | Fax: 206.634.1936 | Toll Free: 1.888.NVL.LABS (685.5227)
4708 Aurora Avenue North | Seattle, WA 98103

Case Narrative:

The following summarizes samples received on date as shown on the accompanied Chain of custody by NVL Laboratories, Inc. from NVL Field Services Division for Project number: 2012-494. Samples were logged in for PCB analysis per client request using both customer sample ID's and laboratory assigned ID's as listed on the Chain-of-Custody (CoC). All samples as received were processed and analyzed within specified turnaround time without any abnormalities and deviations that may affect the analytical results. All quality control requirements were acceptable unless stated otherwise. The conditions of all samples were acceptable at time of receipt and all samples submitted with this batch were analyzed unless stated otherwise on the CoC.

Test Results are reported based on milligram per kilogram (mg/kg) for PCB samples as shown on the analytical reports.

Definition Appendix

Terms

% Rec	Percent recovery.
<	Below Reporting Limit(RL) or Limit of Quantitation(LoQ) of the instrument.
B	Blank contamination. The recorded results is associated with a contaminated blank.
DF	Dilution Factor
J	The reported concentration is an estimated value because something may be present in the sample that interfered with the analysis.
J1	The reported concentration is an estimated value because the laboratory control sample (LCS) is out of control limits.
J2	The reported concentration is an estimated value because the percent recovery for matrix spike is out of control limits.
J3	The reported concentration is an estimated value because the relative percent difference(RPD) for duplicate analysis is out of control limits.
J4	Percent recovery is outside of established control limits.
LCS	Laboratory Control Sample.
Limits	The upper and lower control limits for spike recoveries.
LOQ	Limit of quantitation(same as RL)
mg/kg	Milligrams per kilogram.
ND	Analyte not detected or below the reporting limit of the instrument or methodology
PPM	Parts per Million.
QC Batch Group	Quality Control Batch Group. The entity that links analytical results and supporting quality control results.

Definition Appendix

Terms

R	The data are not reliable due to possible contamination or loss of material during preparation or analysis. Re-sampling and reanalysis are necessary for verification.
RL	Reporting Limit. The minimum concentration that can be quantified under routine operating conditions.
RPD	Relative Percent Difference. The relative difference between duplicate results(matrix spike, blank spike, or samples duplicate) expressed as a percentage.
RPD Limit	The maximum RPD allowed for a set of duplicate measurements(see RPD).
SMI	Surrogate has matrix interference.
Spike Conc.	The measured concentration, in sample basis units, of a spiked sample.
SURR-ND	Surrogate was not detected due to matrix interference or dilution.
ug/m3	Micrograms per cubic meter.
ug/mL	Micrograms per milliliter
mg/Kg	milligram per kilogram

ORGANICS LABORATORY SERVICES



Company NVL Field Services Division Address 4708 Aurora Ave. N. Seattle, WA 98103 Project Manager Mr. Marcus Gladden Phone (206) 547-0100 cell (206) 981-9421 3	NVL Batch Number 1505676.00 TAT 5 Days AH No Rush TAT Due Date 4/7/2015 Time 1:30 PM Email marcus.g@nvlabs.com Fax (206) 634-1936
---	---

Project Name/Number: 2012-494	Project Location: 3100 Airport Way S. Seattle, WA 98134
--------------------------------------	--

Subcategory Quantitative analysis

Item Code ORG-02 8082 PCB Aroclors <Paint>

Total Number of Samples 3

Rush Samples _____

	Lab ID	Sample ID	Description	A/R
1	15031475	33115-Bulk-1		A
2	15031476	33115-Bulk-2		A
3	15031477	33115-Bulk-3		A

	Print Name	Signature	Company	Date	Time
Sampled by	Client				
Relinquished by	Client				
Office Use Only	Print Name	Signature	Company	Date	Time
Received by	Fatima Khan		NVL	3/31/15	1330
Analyzed by	Fredyn Annin		NVL	4/1/15	16:00
Results Called by					
<input type="checkbox"/> Faxed <input type="checkbox"/> Emailed					
Special Instructions:					

Entered By: Fatima Khan

Date: 3/31/2015

Time: 2:30 PM

1 of 1

ANALYSIS REPORT

Polychlorinated Biphenyls by Gas Chromatography



Client	NVL Field Services Division	Samples Received*	3
SDG Number	1505676.00	Analyzed By	Evelyn Ahulu
Date Reported	04/02/2015	Samples Analyzed*	3
Project Number	2012-494	Analysis Method	8082A
Location	3100 Airport Way S. Seattle, WA 98134	Preparation Method	3546PR (PCB)

* for this test only

Sample Number	33115-Bulk-1	Received	03/31/2015
Lab Sample ID	15031475	Matrix	Material
Initial Sample Size	2.0373 gm	Units of Result	mg/Kg, as received

Analyte	RL	Final Result	Analysis Date
Aroclor-1016	0.98	< 0.98	04/01/2015
Aroclor-1221	0.98	< 0.98	04/01/2015
Aroclor-1232	0.98	< 0.98	04/01/2015
Aroclor-1242	0.98	< 0.98	04/01/2015
Aroclor-1248	0.98	< 0.98	04/01/2015
Aroclor-1254	0.98	< 0.98	04/01/2015
Aroclor-1260	0.98	< 0.98	04/01/2015
PCBs, Total	0.98	<0.98	

Comments: BLDG 15 S. ELEV. Bottom Left.

Sample Number	33115-Bulk-2	Received	03/31/2015
Lab Sample ID	15031476	Matrix	Material
Initial Sample Size	2.1749 gm	Units of Result	mg/Kg, as received

Analyte	RL	Final Result	Analysis Date
Aroclor-1016	0.92	< 0.92	04/01/2015
Aroclor-1221	0.92	< 0.92	04/01/2015
Aroclor-1232	0.92	< 0.92	04/01/2015
Aroclor-1242	0.92	< 0.92	04/01/2015
Aroclor-1248	0.92	< 0.92	04/01/2015
Aroclor-1254	0.92	< 0.92	04/01/2015
Aroclor-1260	0.92	< 0.92	04/01/2015
PCBs, Total	0.92	<0.92	

Comments: BLDG 15 S. ELEV Middle

ANALYSIS REPORT

Polychlorinated Biphenyls by Gas Chromatography



Sample Number	33115-Bulk-3	Received	03/31/2015
Lab Sample ID	15031477	Matrix	Material
Initial Sample Size	2.0321 gm	Units of Result	mg/Kg, as received

Analyte	RL	Final Result	Analysis Date
Aroclor-1016	98	< 98	04/01/2015
Aroclor-1221	98	< 98	04/01/2015
Aroclor-1232	98	< 98	04/01/2015
Aroclor-1242	98	< 98	04/01/2015
Aroclor-1248	98	< 98	04/01/2015
Aroclor-1254	98	990	04/01/2015
Aroclor-1260	98	570	04/01/2015

PCBs, Total**98****1560***Comments: BLDG 15 S. ELEV Top Right*



Quality Control Results

Project Number:	2012-494	SDG Number:	1505676
		Project Manager:	Marcus Gladden
QC Batch(es):	Q275	Analysis Method:	8082A
QC Batch Method:	3546PR (PCB)	Analysis Description:	Polychlorinated Biphenyls by Gas Chromatography
Preparation Date:	04/01/2015		
Blank: MBLK-1505676			

Analyte	Blank Result	Units	DF	RL	Control Limit	Qualifiers
Aroclor-1016	ND	mg/Kg	1	1.0	1	
Aroclor-1221	ND	mg/Kg	1	1.0	1	
Aroclor-1232	ND	mg/Kg	1	1.0	1	
Aroclor-1242	ND	mg/Kg	1	1.0	1	
Aroclor-1248	ND	mg/Kg	1	1.0	1	
Aroclor-1254	ND	mg/Kg	1	1.0	1	
Aroclor-1260	ND	mg/Kg	1	1.0	1	
PCBs, Total	ND	mg/Kg	1	1.0	1	
<i>Surrogates:</i>				% Rec		
Tetrachloro-m-xylene			1	71	40-140	
Decachlorobiphenyl			1	95	40-140	

Lab Control Sample: MSPK-1505676

Analyte	Blank Spike Result	Units	DF	Spike Conc.	% Rec	% Rec Limits	Qualifiers
Aroclor-1254	17.1	mg/Kg	1	20.0	85	40-140	
<i>Surrogates:</i>							
Tetrachloro-m-xylene			1		85	40-140	
Decachlorobiphenyl			1		97	40-140	

Lab Control Sample: LCS-1505676

Lab Control Sample Duplicate: LCS DUP- 1505676

Analyte	Blank Spike Result	Units	DF	Spike Conc.	% Rec	Limits	RPD	RPD Limit	Qualifiers
Aroclor-1016	18.8	mg/Kg	1	20.0	94	40-140			
	19.7			20.0	98	40-140	5	50	
Aroclor-1260	21.3	mg/Kg	1	20.0	107	40-140			
	20.3			20.0	101	40-140	5	50	
<i>Surrogates:</i>									
Tetrachloro-m-xylene			1		88	40-140			
					94	40-140			
Decachlorobiphenyl			1		102	40-140			
					102	40-140			



Surrogate Recovery Summary Report

Client	NVL Field Services Division		SDG Number	1505676	
Project	2012-494				
Customer Sample ID		Lab Sample ID	Analyte	Recovery	Limits
33115-Bulk-1		15031475	Decachlorobiphenyl	96%	40-140
33115-Bulk-1		15031475	Tetrachloro-m-xylene	81%	40-140
33115-Bulk-2		15031476	Decachlorobiphenyl	102%	40-140
33115-Bulk-2		15031476	Tetrachloro-m-xylene	95%	40-140
33115-Bulk-3		15031477	Decachlorobiphenyl	100%	40-140
33115-Bulk-3		15031477	Tetrachloro-m-xylene	87%	40-140
LCS DUP- 1505676		LCS DUP- 1505676	Decachlorobiphenyl	102%	40-140
LCS DUP- 1505676		LCS DUP- 1505676	Tetrachloro-m-xylene	94%	40-140
LCS-1505676		LCS-1505676	Decachlorobiphenyl	102%	40-140
LCS-1505676		LCS-1505676	Tetrachloro-m-xylene	88%	40-140
MBLK-1505676		MBLK-1505676	Decachlorobiphenyl	95%	40-140
MBLK-1505676		MBLK-1505676	Tetrachloro-m-xylene	71%	40-140
MSPK-1505676		MSPK-1505676	Decachlorobiphenyl	97%	40-140
MSPK-1505676		MSPK-1505676	Tetrachloro-m-xylene	85%	40-140

* Recovery outside limits

INITIAL AND CONTINUING CALIBRATION VERIFICATIONSDG No: **1505676**Contract: **N/A**Determination: **8082 PCB Aroclors <Material>**

Run	Sample	Source	Analyzed	Analyte	True	Found	Unit	% Rec	Limits
R000268	CCV1- 1016 -1260	PCB_2014-1-17	04/01/2015	Aroclor-1016	5	5	ug/mL	100	80-120
		PCB_2014-1-17	04/01/2015	Aroclor-1260	5	5	ug/mL	100	80-120
	CCV1 -1254	PCB_2014-1-18	04/01/2015	Aroclor-1254	5	5	ug/mL	100	80-120
	ICV 1016-1254-1 260	PCB_2014-2-4	04/01/2015	Aroclor-1016	5	4.226	ug/mL	85	85-115
		PCB_2014-2-4	04/01/2015	Aroclor-1254	5	4.723	ug/mL	94	85-115
		PCB_2014-2-4	04/01/2015	Aroclor-1260	5	5.088	ug/mL	102	85-115
	CCV2 1016 - 1260	PCB_2014-1-17	04/01/2015	Aroclor-1016	5	5.012	ug/mL	100	80-120
		PCB_2014-1-17	04/01/2015	Aroclor-1260	5	5.148	ug/mL	103	80-120
	CCV2-1254	PCB_2014-1-18	04/01/2015	Aroclor-1254	5	5.046	ug/mL	101	80-120

% Rec = Percent recovery

* = Percent recovery not within control limits

NVL Laboratories, Inc.

4708 Aurora Ave N, Seattle, WA 98103

p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

CHAIN of CUSTODY SAMPLE LOG

1505676



Client NVL Laboratories Inc
Street 4708 Aurora Ave N
Seattle, WA 98103
Project Manager Munaf Khan
Project Location 3100 Airport Way South
Seattle, WA 98134

NVL Batch Number _____
Client Job Number 2012-494
Total Samples 3

Turn Around Time ☐ 1 Hr ☐ 6 Hrs ☐ 3 Days ☐ 10 Days
☐ 2 Hrs ☐ 1 Day ☐ 4 Days
☐ 4 Hrs ☐ 2 Days ☒ 5 Days

Please call for TAT less than 24 Hrs

Email address _____

Phone: (206) 447-0263 Fax: (206) 447-0299

<input type="checkbox"/> Asbestos Air	<input type="checkbox"/> PCM (NIOSH 7400)	<input type="checkbox"/> TEM (NIOSH 7402)	<input type="checkbox"/> TEM (AHERA)	<input type="checkbox"/> TEM (EPA Level II)	<input type="checkbox"/> Other
<input type="checkbox"/> Asbestos Bulk	<input type="checkbox"/> PLM (EPA/600/R-93/116)	<input type="checkbox"/> PLM (EPA Point Count)	<input type="checkbox"/> PLM (EPA Gravimetry)	<input type="checkbox"/> TEM BULK	
<input type="checkbox"/> Mold/Fungus	<input type="checkbox"/> Mold Air	<input type="checkbox"/> Mold Bulk	<input type="checkbox"/> Rotometer Calibration		
METALS	Det. Limit	Matrix	RCRA Metals	<input type="checkbox"/> All 8	Other Metals
<input type="checkbox"/> Total Metals	<input type="checkbox"/> FAA (ppm)	<input type="checkbox"/> Air Filter	<input type="checkbox"/> Arsenic (As)	<input type="checkbox"/> Chromium (Cr)	<input type="checkbox"/> All 3
<input type="checkbox"/> TCLP	<input type="checkbox"/> ICP (ppm)	<input type="checkbox"/> Drinking water	<input type="checkbox"/> Barium (Ba)	<input type="checkbox"/> Lead (Pb)	<input type="checkbox"/> Copper (Cu)
<input type="checkbox"/> Cr 6	<input type="checkbox"/> GFAA (ppb)	<input type="checkbox"/> Dust/wipe (Area)	<input type="checkbox"/> Cadmium (Cd)	<input type="checkbox"/> Mercury (Hg)	<input type="checkbox"/> Nickel (Ni)
<input checked="" type="checkbox"/> Other Types of Analysis	<input type="checkbox"/> Fiberglass	<input type="checkbox"/> Nuisance Dust	<input checked="" type="checkbox"/> Other (Specify) <u>PCB's - Bulk - EPA 8082</u>		
	<input type="checkbox"/> Silica	<input type="checkbox"/> Respirable Dust			

Condition of Package: ☐ Good ☐ Damaged (no spillage) ☐ Severe damage (spillage)

Seq. #	Lab ID	Client Sample Number	Comments	A/R
1		33115-BULK-1	BLDG 15 S. ELEV. BOTTOM LEFT	
2		33115-BULK-2	BLDG 15 S. ELEV. MIDDLE	
3		33115-BULK-3	BLDG 15 S. ELEV. TOP RIGHT	
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

	Print Below	Sign Below	Company	Date	Time
Sampled by	Marcus Guzman		NVL Labs	3/31/15	10:00
Relinquished by			NVL	3/31/15	13:30
Received by			NVL	3/31/15	1:30p
Analyzed by	Evelyn Ahn		NVL	3/31/15	16:00
Results Called by					
Results Faxed by					

Special Instructions: Unless requested in writing, all samples will be disposed of two (2) weeks after analysis.

Results report to

EXHIBIT 3

April 2, 2015



MANAGEMENT | TRAINING | LAB SERVICES
www.NVLLABS.com

Mr. Marcus Gladden
NVL Field Services Division
4708 Aurora Ave, N.
Seattle, WA 98103

Re: **NVL Batch 1505776.00**

Project Name/Number: 2012-494

Project Location: 3100 Airport Way S. Seattle, WA 98134

Dear Mr. Gladden,

Enclosed please find test results for sample submitted to our laboratory for analysis. Preparation and analysis of these samples were conducted in accordance with methods specified on the attached test reports.

The content of this package consists of the following:

- Case Narrative & Definition of Data Qualifiers
- Analytical Test Results
- Applicable QC Summary
- Client Chain -of-Custody (CoC)
- NVL Receiving Record

The report is considered highly confidential and will not be released without your approval. Samples are archived for two weeks following analysis. Samples that are not retrieved by the client will be discarded after two weeks.

Thank you for using our laboratory services. If you need further assistance, please contact us at 206-547-0100 or 1-888-NVLLABS.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nick Ly".

for: Nick Ly, Technical Director.

Case Narrative:

The following summarizes samples received on date as shown on the accompanied Chain of custody by NVL Laboratories, Inc. from NVL Field Services Division for Project No.2012-494. Samples were logged in for PCB analysis per client request using both customer sample ID's and laboratory assigned ID's as listed on the Chain-of-Custody (CoC). All samples as received were processed and analyzed within specified turnaround time without any abnormalities and deviations that may affect the analytical results. All quality control requirements were acceptable unless stated otherwise. The conditions of all samples were acceptable at time of receipt and all samples submitted with this batch were analyzed unless stated otherwise on the CoC.

Test Results are reported based on Milligram per Kilogram (Mg/Kg) for PCB samples as shown on the analytical reports.

Definition Appendix

Terms

% Rec	Percent recovery.
<	Below Reporting Limit(RL) or Limit of Quantitation(LoQ) of the instrument.
B	Blank contamination. The recorded results is associated with a contaminated blank.
DF	Dilution Factor
J	The reported concentration is an estimated value because something may be present in the sample that interfered with the analysis.
J1	The reported concentration is an estimated value because the laboratory control sample (LCS) is out of control limits.
J2	The reported concentration is an estimated value because the percent recovery for matrix spike is out of control limits.
J3	The reported concentration is an estimated value because the relative percent difference(RPD) for duplicate analysis is out of control limits.
J4	Percent recovery is outside of established control limits.
LCS	Laboratory Control Sample.
Limits	The upper and lower control limits for spike recoveries.
LOQ	Limit of quantitation(same as RL)
mg/kg	Milligrams per kilogram.
ND	Analyte not detected or below the reporting limit of the instrument or methodology
PPM	Parts per Million.
QC Batch Group	Quality Control Batch Group. The entity that links analytical results and supporting quality control results.

Definition Appendix

Terms

R	The data are not reliable due to possible contamination or loss of material during preparation or analysis. Re-sampling and reanalysis are necessary for verification.
RL	Reporting Limit. The minimum concentration that can be quantified under routine operating conditions.
RPD	Relative Percent Difference. The relative difference between duplicate results(matrix spike, blank spike, or samples duplicate) expressed as a percentage.
RPD Limit	The maximum RPD allowed for a set of duplicate measurements(see RPD).
SMI	Surrogate has matrix interference.
Spike Conc.	The measured concentration, in sample basis units, of a spiked sample.
SURR-ND	Surrogate was not detected due to matrix interference or dilution.
ug/m3	Micrograms per cubic meter.
ug/mL	Micrograms per milliliter
mg/Kg	milligram per kilogram

ORGANICS LABORATORY SERVICES



Company NVL Field Services Division
Address 4708 Aurora Ave. N.
 Seattle, WA 98103
Project Manager Mr. Marcus Gladden
Phone (206) 547-0100
 cell (206) 981-9421 3
NVL Batch Number 1505776.00
TAT 1 Day **AH** No
Rush TAT
Due Date 4/2/2015 **Time** 12:20 PM
Email marcus.g@nvlabs.com
Fax (206) 634-1936

Project Name/Number: 2012-494 **Project Location:** 3100 Airport Way S. Seattle, WA 98134

Subcategory Quantitative analysis

Item Code ORG-05 8082 PCB Aroclors <Bulk>

Total Number of Samples 2

Rush Samples

	Lab ID	Sample ID	Description	A/R
1	15031990	040115-DPL-1		A
2	15031991	040115-DPL-2		A

	Print Name	Signature	Company	Date	Time
Sampled by	Client				
Relinquished by	Client				
Office Use Only	Print Name	Signature	Company	Date	Time
Received by	Maxwell Raymond		NVL	4/1/15	1220
Analyzed by	Evelyn Ahulu		NVL	4/1/15	1600
Results Called by					
<input type="checkbox"/> Faxed <input type="checkbox"/> Emailed					

Special BILL TO NVL JOB 2012-494
Instructions:

Entered By: Maxwell Raymond

Date: 4/1/2015

Time: 1:12 PM

1 of 1

RCLLC 0009554

ANALYSIS REPORT

Polychlorinated Biphenyls by Gas Chromatography



Client	NVL Field Services Division	Samples Received*	2
SDG Number	1505776.00	Analyzed By	Evelyn Ahulu
Date Reported	04/02/2015	Samples Analyzed*	2
Project Number	2012-494	Analysis Method	8082A
Location	3100 Airport Way S. Seattle, WA 98134	Preparation Method	3546PR (PCB)

* for this test only

Sample Number	040115-DPL-1	Received	04/01/2015
Lab Sample ID	15031990	Matrix	Paint Chips
Initial Sample Size	2.1248 gm	Units of Result	mg/Kg, as received

Analyte	RL	Final Result	Analysis Date
Aroclor-1016	0.94	< 0.94	04/01/2015
Aroclor-1221	0.94	< 0.94	04/01/2015
Aroclor-1232	0.94	< 0.94	04/01/2015
Aroclor-1242	0.94	< 0.94	04/01/2015
Aroclor-1248	0.94	< 0.94	04/01/2015
Aroclor-1254	0.94	6.7	04/01/2015
Aroclor-1260	0.94	3.6	04/01/2015
PCBs, Total	0.94	10.3	04/01/2015

Comments: BLDG 15-South Elevation- West End-HIGH

Sample Number	040115-DPL-2	Received	04/01/2015
Lab Sample ID	15031991	Matrix	Paint Chips
Initial Sample Size	0.8942 gm	Units of Result	mg/Kg, as received

Analyte	RL	Final Result	Analysis Date
Aroclor-1016	2.2	< 2.2	04/01/2015
Aroclor-1221	2.2	< 2.2	04/01/2015
Aroclor-1232	2.2	< 2.2	04/01/2015
Aroclor-1242	2.2	< 2.2	04/01/2015
Aroclor-1248	2.2	< 2.2	04/01/2015
Aroclor-1254	2.2	2.7	04/01/2015
Aroclor-1260	2.2	< 2.2	04/01/2015
PCBs, Total	2.2	2.7	04/01/2015

Comments: BLDG 15- South Elevation- East End - LOW

NVL Laboratories, Inc.

4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com



Quality Control Results

Project Number:	2012-494	SDG Number:	1505776
		Project Manager:	Marcus Gladden
QC Batch(es):	Q276	Analysis Method:	8082A
QC Batch Method:	3546PR (PCB)	Analysis Description:	Polychlorinated Biphenyls by Gas Chromatography
Preparation Date:	04/01/2015		
Blank: MBLK-1505776			

Analyte	Blank Result	Units	DF	RL	Control Limit	Qualifiers
Aroclor-1016	ND	mg/Kg	1	1.0	1	
Aroclor-1221	ND	mg/Kg	1	1.0	1	
Aroclor-1232	ND	mg/Kg	1	1.0	1	
Aroclor-1242	ND	mg/Kg	1	1.0	1	
Aroclor-1248	ND	mg/Kg	1	1.0	1	
Aroclor-1254	ND	mg/Kg	1	1.0	1	
Aroclor-1260	ND	mg/Kg	1	1.0	1	
PCBs, Total	ND	mg/Kg	1	1.0	1	
Surrogates:				% Rec		
Tetrachloro-m-xylene			1	71	40-140	
Decachlorobiphenyl			1	95	40-140	

Lab Control Sample: MSPK-1505776

Analyte	Blank Spike Result	Units	DF	Spike Conc.	% Rec	% Rec Limits	Qualifiers
Aroclor-1254	17.1	mg/Kg	1	20.0	85	40-140	
Surrogates:							
Tetrachloro-m-xylene			1		85	40-140	
Decachlorobiphenyl			1		97	40-140	

Lab Control Sample: LCS-1505776
Lab Control Sample Duplicate: LCS DUP- 1505776

Analyte	Blank Spike Result	Units	DF	Spike Conc.	% Rec	Limits	RPD	RPD Limit	Qualifiers
Aroclor-1016	18.8	mg/Kg	1	20.0	94	40-140			
	19.9			20.0	99	40-140	6	50	
Aroclor-1260	21.3	mg/Kg	1	20.0	107	40-140			
	20.3			20.0	101	40-140	5	50	
Surrogates:									
Tetrachloro-m-xylene			1		88	40-140			
					94	40-140			
Decachlorobiphenyl			1		102	40-140			
					102	40-140			

NVL Laboratories, Inc.

4708 Aurora Ave N, Seattle, WA 98103
p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

**Surrogate Recovery Summary Report****Client** NVL Field Services Division**SDG Number** 1505776**Project** 2012-494

Customer Sample ID	Lab Sample ID	Analyte	Recovery	Limits
040115-DPL-1	15031990	Decachlorobiphenyl	89%	40-140
040115-DPL-1	15031990	Tetrachloro-m-xylene	108%	40-140
040115-DPL-2	15031991	Decachlorobiphenyl	97%	40-140
040115-DPL-2	15031991	Tetrachloro-m-xylene	96%	40-140
LCS DUP- 1505776	LCS DUP- 1505776	Decachlorobiphenyl	102%	40-140
LCS DUP- 1505776	LCS DUP- 1505776	Tetrachloro-m-xylene	94%	40-140
LCS-1505776	LCS-1505776	Decachlorobiphenyl	102%	40-140
LCS-1505776	LCS-1505776	Tetrachloro-m-xylene	88%	40-140
MBLK-1505776	MBLK-1505776	Decachlorobiphenyl	95%	40-140
MBLK-1505776	MBLK-1505776	Tetrachloro-m-xylene	71%	40-140
MSPK-1505776	MSPK-1505776	Decachlorobiphenyl	97%	40-140
MSPK-1505776	MSPK-1505776	Tetrachloro-m-xylene	85%	40-140

* Recovery outside limits

INITIAL AND CONTINUING CALIBRATION VERIFICATIONSDG No: **1505776**Contract: **N/A**Determination: **8082 PCB Aroclors <Paint>**

Run	Sample	Source	Analyzed	Analyte	True	Found	Unit	% Rec	Limits
R000269	CCV1 1016 -1260	PCB_2014-1-17	04/01/2015	Aroclor-1016	5	5	ug/mL	100	80-120
		PCB_2014-1-17	04/01/2015	Aroclor-1260	5	5	ug/mL	100	80-120
	CCV1 1254	PCB_2014-1-18	04/01/2015	Aroclor-1254	5	5	ug/mL	100	80-120
	ICV 1016-1254- 1260	PCB_2014-2-4	04/01/2015	Aroclor-1016	5	4.226	ug/mL	85	85-115
		PCB_2014-2-4	04/01/2015	Aroclor-1254	5	4.723	ug/mL	94	85-115
		PCB_2014-2-4	04/01/2015	Aroclor-1260	5	5.088	ug/mL	102	85-115
	CCV2 1016 - 1260	PCB_2014-1-17	04/01/2015	Aroclor-1016	5	5.012	ug/mL	100	80-120
		PCB_2014-1-17	04/01/2015	Aroclor-1260	5	5.148	ug/mL	103	80-120
	CCV2-1254	PCB_2014-1-18	04/01/2015	Aroclor-1254	5	5.046	ug/mL	101	80-120

% Rec = Percent recovery

* = Percent recovery not within control limits

NVL Laboratories, Inc.

4708 Aurora Ave N, Seattle, WA 98103

Tel: 206.547.0100 Emerg.Cell: 206.914.4646

Fax: 206.634.1936 1.888.NVL.LABS (685.5227)

**CHAIN of CUSTODY
SAMPLE LOG****1505776****Client** Rainier Commons, LLC**Street** 918 S. Horton Street, Suite 101
Seattle, WA 98134**NVL Batch Number****Client Job Number** 2012-494**Total Samples****Turn Around Time** ☐ 1-Hr ☐ 8-Hrs ☐ 2 ☐ 5
☐ 2-Hrs ☐ 12-Hrs ☐ 3 ☐ 6-10
☐ 4-Hrs ☒ 24-Hrs ☐ 4





Please call for TAT less than 24 Hrs

Project Manager Mr. Doug Lansing**Project Location** 3100 Airport Way S. Seattle, WA 98134**Email address** lansinghomes@aol.com**Phone:** (206) 447-0263**Fax:** (206) 447-0299**Cell** (b) (6)

<input type="checkbox"/> Asbestos Air	<input type="checkbox"/> PCM (NIOSH 7400)	<input type="checkbox"/> TEM (NIOSH 7402)	<input type="checkbox"/> TEM (AHERA)	<input type="checkbox"/> TEM (EPA Level II)	<input type="checkbox"/> Other
<input type="checkbox"/> Asbestos Bulk	<input type="checkbox"/> PLM (EPA/600/R-93/116)	<input type="checkbox"/> PLM (EPA Point Count)	<input type="checkbox"/> PLM (EPA Gravimetry)	<input type="checkbox"/> TEM BULK	
<input type="checkbox"/> Mold/Fungus	<input type="checkbox"/> Mold Air	<input type="checkbox"/> Mold Bulk	<input type="checkbox"/> Rotometer Calibration		
METALS	Det. Limit	Matrix	RCRA Metals	<input type="checkbox"/> All 8	Other Metals
<input type="checkbox"/> Total Metals	<input type="checkbox"/> FAA (ppm)	<input type="checkbox"/> Air Filter	<input type="checkbox"/> Arsenic (As)	<input type="checkbox"/> Chromium (C)	<input type="checkbox"/> All 3
<input type="checkbox"/> TCLP	<input type="checkbox"/> ICP (ppm)	<input type="checkbox"/> Drinking water	<input type="checkbox"/> Barium (Ba)	<input type="checkbox"/> Lead (Pb)	<input type="checkbox"/> Copper (Cu)
<input type="checkbox"/> Cr 6	<input type="checkbox"/> GFAA (ppb)	<input type="checkbox"/> Dust/wipe (Area)	<input type="checkbox"/> Cadmium (Cd)	<input type="checkbox"/> Mercury (Hg)	<input type="checkbox"/> Nickel (Ni)
<input type="checkbox"/> Other Types of Analysis	<input type="checkbox"/> Fiberglass	<input type="checkbox"/> Nuisance Dust	<input checked="" type="checkbox"/> Other (Specify) <u>PCB - BULK</u>		<input type="checkbox"/> Zinc (Zn)
	<input type="checkbox"/> Silica	<input type="checkbox"/> Respirable Dust			

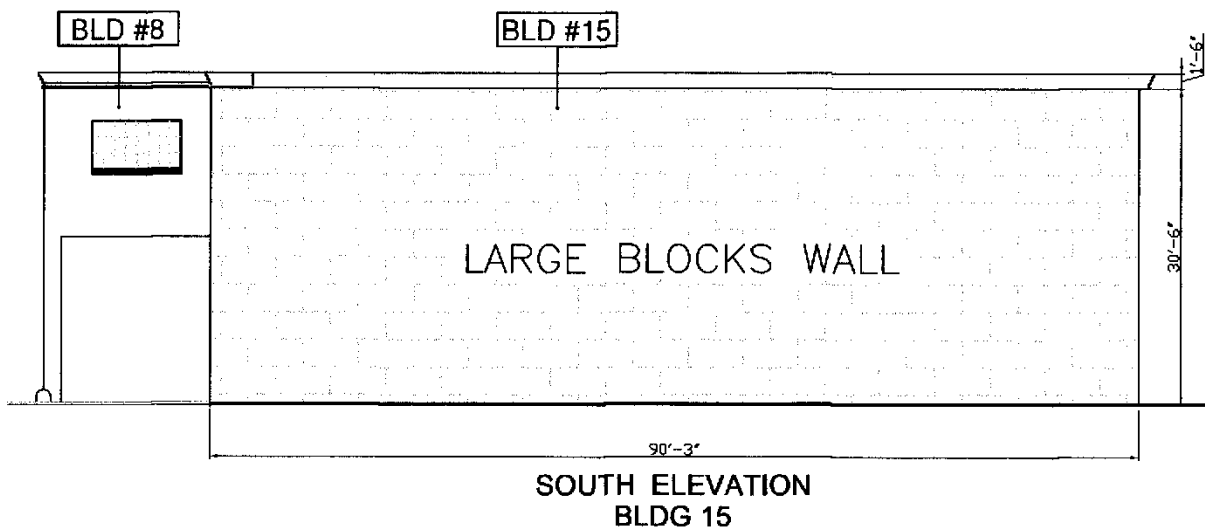
Condition of Package: ☐ Good ☐ Damaged (no spillage) ☐ Severe damage (spillage)

Seq. #	Lab ID	Client Sample Number	Comments (e.g Sample are, Sample Volume, etc)	A/R
1		040115-DPL-1	BLDG 15 - SOUTH ELEVATION - WEST END - HIGH	
2		040115 DPL-2	BLDG 15 - SOUTH ELEVATION - EAST END - LOW	
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

	Print Below	Sign Below	Company	Date	Time
Sampled by	D. LANSING		R.C.	4-1-15	1155
Relinquished by	D. LANSING		R.C.	4-1-15	
Received by	Max		NVL	4/1/15	1220
Analyzed by	Evelyn Almon		NVL	4/1/15	16:00
Results Called by					
Results Faxed by					

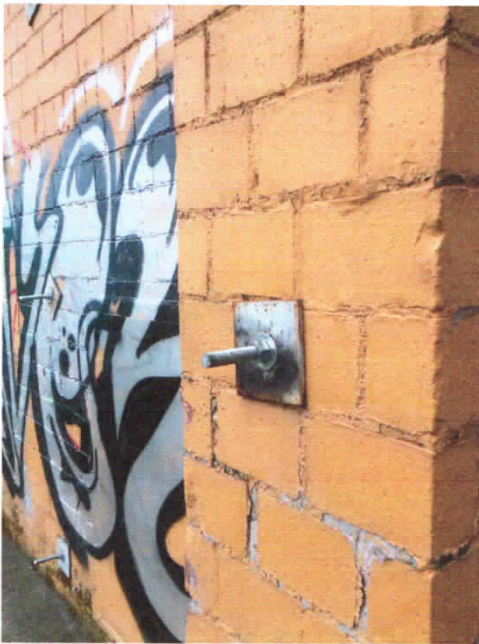
Special Instructions: Unless requested in writing, all samples will be disposed of two (2) weeks after analysis.

EXHIBIT 4

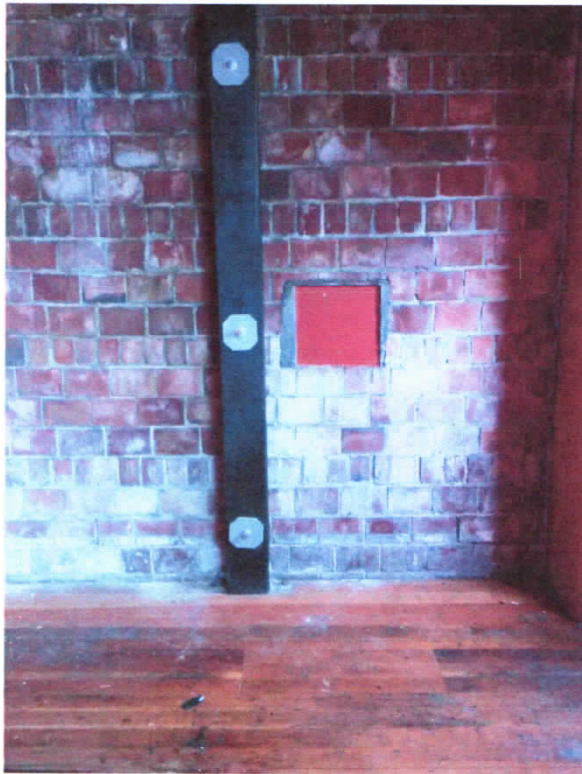




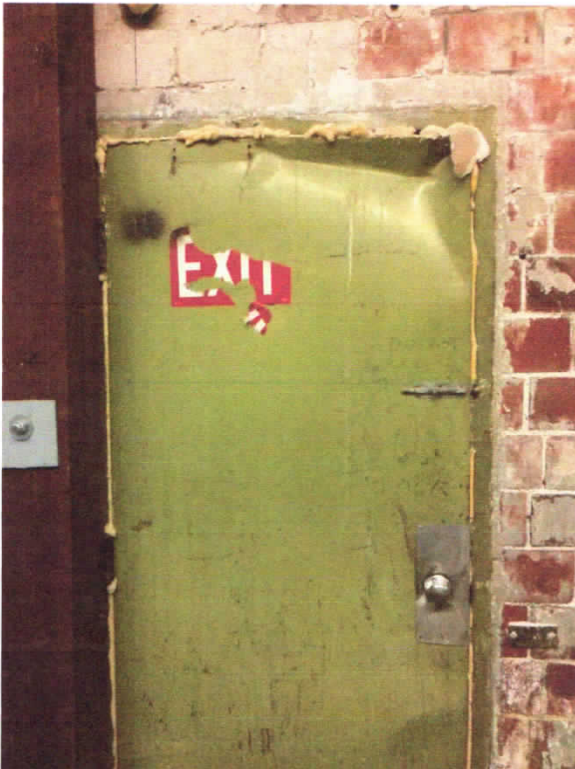
Building 15, South Elevation



Seismic tie-bolt with metal plate (typical)



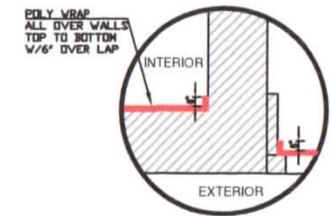
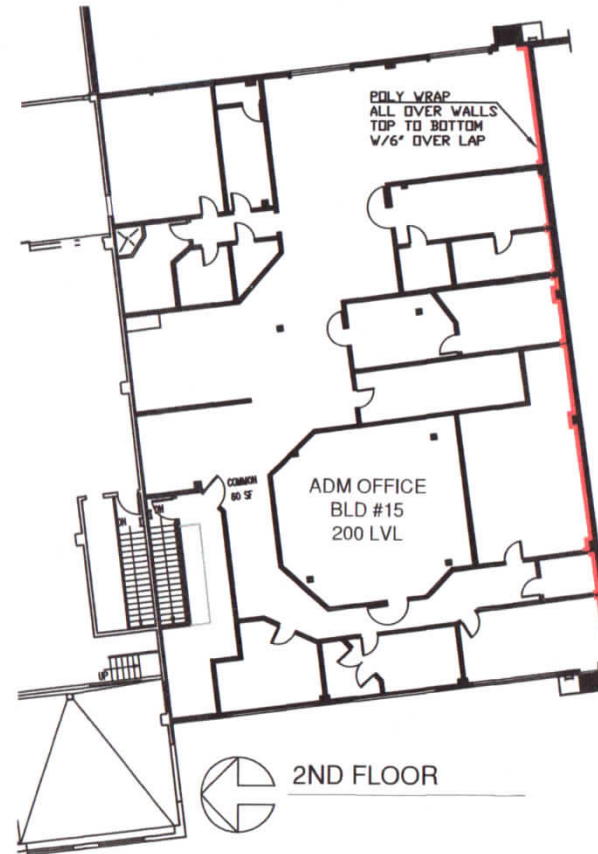
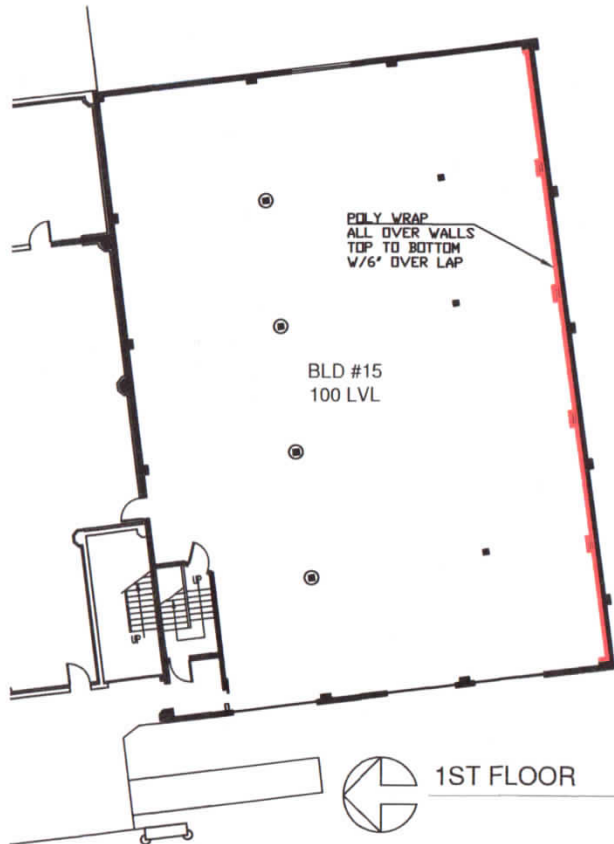
Interior view of seismic tie-bolt.
(Note sealed, abandoned vent opening next to column)



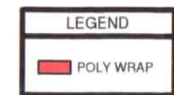
Sealed, disabled exterior door

Phase II Interior Poly Wrap Plan

BUILDING 15, 1ST & 2ND FLOORS

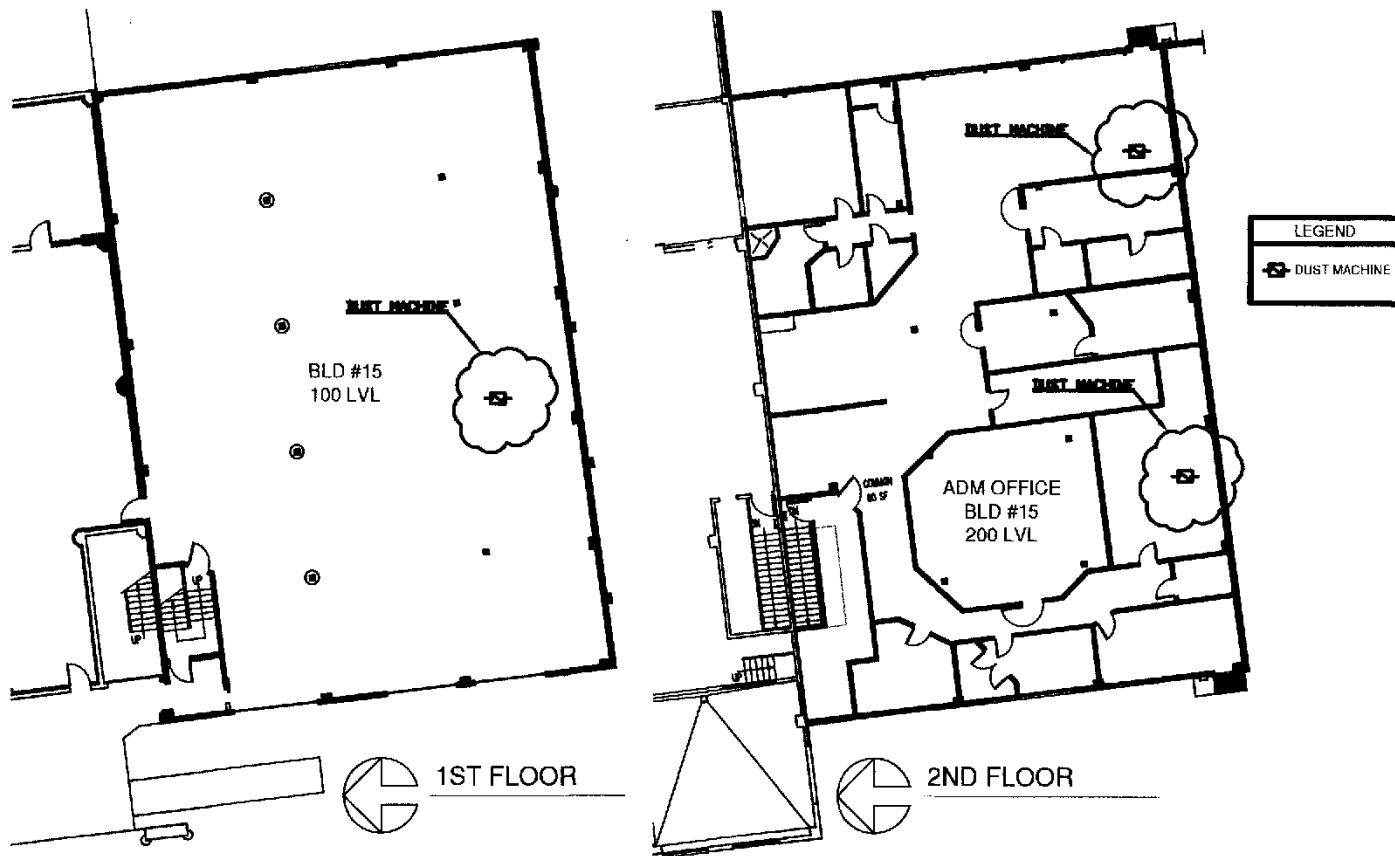


POLY DETAIL

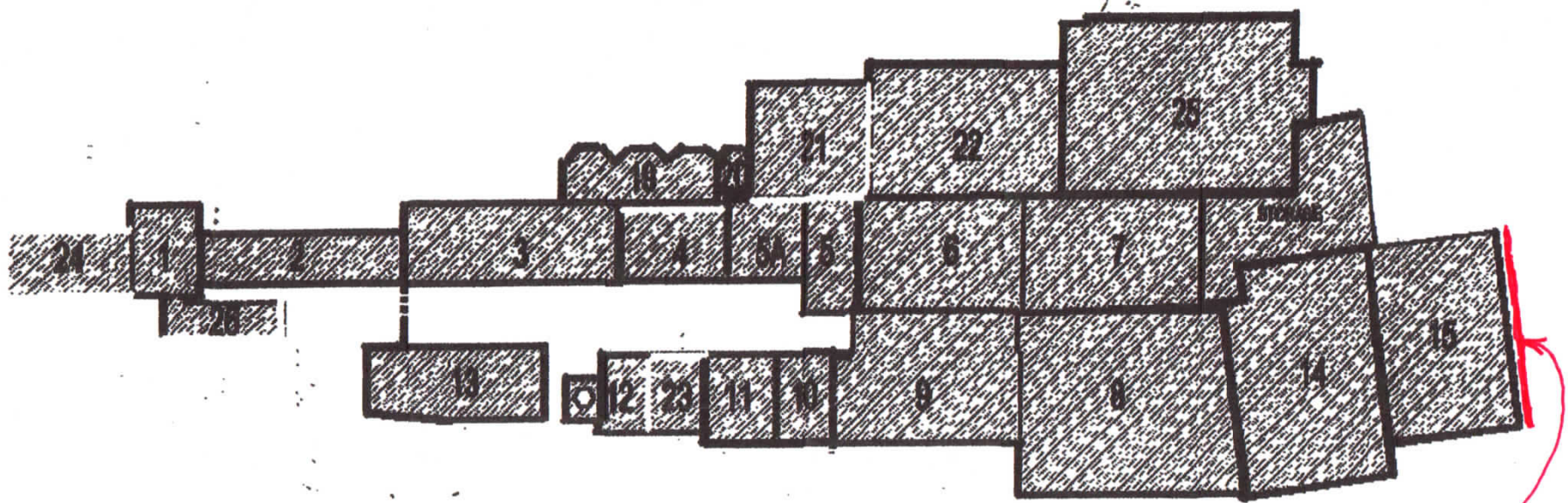


Phase II Interior Dust Machine plan

BUILDING 15, 1ST & 2ND FLOORS



Note: No points of egress exist on the South elevation of building 15.



KEY PLAN

N.T.S.

*BLDG 15
SOUTH ELEVATION*

EXHIBIT 5

Roof Drain Inlet Protection for Building 15, Abatement on South Elevation

The roof system for Building 15 consists of an impervious membrane attached to the underlying structure via a "torch down" installation methodology. At the roof deck to parapet wall intersection, the roof membrane is extended several inches up the parapet wall, where it is counter-flashed with a galvanized roof cap.

The roof structure is slightly sloped west-to-east, to provided drainage. At the east elevation, two roof drain outlets are provided. These outlets are outside the area being abated and therefore do not require additional protection.

The roof drain outlets are currently protected with replaceable fabric and foam filters. These filters are changed on a weekly basis during non-rain events, and daily during rain events.